

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC.

Defendants.

Case No.: 2:25-CV-00553

MOTION TO DISMISS WITHOUT PREJUDICE PURSUANT TO RULE 41(a)(1)(A)(i)

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff Netlist, Inc. hereby files its motion for dismissal without prejudice of all claims asserted against Defendants Samsung electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. Defendants have not answered.

Dated: May 20, 2025

Respectfully submitted,

/s/ Jennifer L. Truelove

Samuel F. Baxter

Texas State Bar No. 01938000

sbaxter@mckoolsmith.com

Jennifer L. Truelove

Texas State Bar No. 24012906

jtruelove@mckoolsmith.com

MCKOOL SMITH P.C.

104 East Houston Street, Suite 300

Marshall, Texas 75670

Telephone: (903) 923-9000

Telecopier: (903) 923-9099

Jason G. Sheasby (*pro hac vice* forthcoming)

jsheasby@irell.com

Lisa S. Glasser (*pro have vice* forthcoming)

lglasser@irell.com

Andrew J. Strabone (*pro hac vice* forthcoming)

astrabone@irell.com

Annita Zhong, PhD (*pro have vice* forthcoming)

hzhong@irell.com

Thomas C Werner (*pro have vice* forthcoming)

twerner@irell.com

Michael W. Tezyan (*pro have vice* forthcoming)

mtezyan@irell.com

IRELL & MANELLA LLP

1800 Avenue of the Stars, Ste. 900

Los Angeles, CA 90067

Attorneys for Plaintiff Netlist, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on May 20, 2025.

/s/ Jennifer L. Truelove

Jennifer L. Truelove